

**EXHIBIT A**

Stipulation

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14  
15 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION,**

18 **- and -**

19 **PACIFIC GAS AND ELECTRIC**  
20 **COMPANY,**

21 **Debtors.**

22  Affects PG&E Corporation  
23  Affects Pacific Gas and Electric Company  
24  Affects both Debtors

25 \* *All papers shall be filed in the lead case,*  
26 *No. 19-30088 (DM)*

27 Case No. 19-30088 (DM)  
28 Chapter 11  
(Lead Case)  
(Jointly Administered)

29 **STIPULATION BETWEEN PACIFIC GAS**  
**AND ELECTRIC COMPANY AND**  
**RICHARD TROCHE, ROBERT RIGLEY,**  
**STEVE FREDIANI, AND MICHAEL**  
**DION FOR LIMITED RELIEF FROM**  
**THE AUTOMATIC STAY**

1        This stipulation (“**Stipulation**”) is entered into by Pacific Gas and Electric Company, as  
2 debtor and debtor in possession (the “**Utility**”), on the one hand, and Richard Troche, Robert  
3 Rigley, Steve Frediani, and Michael Dion (collectively, the “**Prospective Plaintiffs**”), on the  
4 other hand. The Utility and the Prospective Plaintiffs are referred to in this Stipulation  
5 collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as  
6 follows:

## RECITALS

8           A.       The Utility and its parent, PG&E Corporation (together with the Utility, the  
9        “**Debtors**”), filed these Chapter 11 Cases on January 29, 2019.

10 B. The Prospective Plaintiffs each seek to commence individual lawsuits  
11 (collectively, the “**Prospective Lawsuits**”, and each individually, a “**Prospective Lawsuit**”) in  
12 the Superior Courts of the State of California (the “**State Courts**”) in order to pursue their  
13 respective claims against the Utility allegedly arising out of the Utility’s termination of their  
14 employment.

15 C. Pursuant to section 362(a) of the title 11 of the United States Code (the  
16 “**Bankruptcy Code**”), the automatic stay prohibits the Prospective Plaintiffs from commencing  
17 their Prospective Lawsuits.

18       D.     The Prospective Plaintiffs have requested that the Utility agree to modify the  
19 automatic stay in order to allow them to commence their Prospective Lawsuits, and have stated  
20 their intent to move before the Court for relief from the automatic stay if no agreement can be  
21 reached with the Debtors. The Debtors believe it is in the best interest of their estates to avoid  
22 the burden and cost that would be associated with opposing such motions for relief from the  
23 automatic stay.

24       E.      The Parties thus agree that, pursuant to section 362(d) of the Bankruptcy Code, it  
25 is appropriate to modify the automatic stay for the limited purpose of allowing the Prospective  
26 Plaintiffs to commence and prosecute their Prospective Lawsuits, including for the purpose of  
27 the determination, but not the collection, of any money judgments in such proceedings.

**NOW, THEREFORE, IT HEREBY IS STIPULATED AND AGREED BY AND  
BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES  
JOINTLY REQUEST THE COURT TO ORDER, THAT:**

1. This Stipulation, as well as the limited relief from the automatic stay provided herein, shall become effective upon entry of an order by the Court approving it, notwithstanding any contrary effect of Federal Rule of Bankruptcy Procedure 4001(a)(3).

2. Effective as the date of an order approving this Stipulation, the automatic stay shall be modified for the limited purpose of allowing the Prospective Plaintiffs to commence and prosecute their individual Prospective Lawsuits and liquidate their claims, including for the purpose of the determination, but not the collection of, any money judgments in such proceedings.

3. Unless and until further order of the Court, the automatic stay shall continue to apply to the enforcement of any money judgments awarded in the Prospective Lawsuits. Absent further order of the Court and for good cause shown, the Prospective Plaintiffs each shall seek to recover any such money judgment only through the claims process in these Chapter 11 Cases and in accordance with any plan of reorganization confirmed in these Chapter 11 Cases. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors of any right to object on any grounds to any claim submitted in these Chapter 11 Cases by any of the Prospective Plaintiffs.

4. This Stipulation is without prejudice to any aspect of the underlying Prospective Lawsuits, whether procedural or substantive, and nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors or any of the Prospective Plaintiffs of any rights, claims, defenses, or arguments with respect to the same.

5. In the event that the terms of this Stipulation are not approved by the Court, the Stipulation shall be null and void and have no force or effect and the Parties agree that, in such circumstances, this Stipulation shall be of no evidentiary value whatsoever in any proceedings.

1                   6. This Stipulation shall be binding on the Parties and each of their  
2 successors in interest.

3                   7. This Stipulation shall constitute the entire agreement and understanding of  
4 the Parties relating to the subject matter hereof and supersede all prior agreements and  
5 understandings relating to the subject matter hereof.

6                   8. The Court shall retain jurisdiction to resolve any disputes or controversies  
7 arising from this Stipulation or any order approving the terms of this Stipulation.

9                   Dated: April 9, 2020

10                  WEIL, GOTSHAL & MANGES LLP  
11                  KELLER BENVENUTTI KIM LLP

12                  */s/ Theodore E. Tsekerides*

13                  Theodore E. Tsekerides

14                  *Attorneys for Debtors  
and Debtors in Possession*

9                   Dated: April 9, 2020

10                  COREY, LUZAICH, DE GHETALDI &  
11                  RIDDLE LLP

12                  */s/ Steven M. Berki*

13                  Steven M. Berki

14                  *Attorneys for Richard Troche, Robert  
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